

## DECLARATION OF KATHY HALL HUGO

My Name is Kathy Hall Hugo. I am an adult resident of Westmoreland County, Pennsylvania. I state the following.

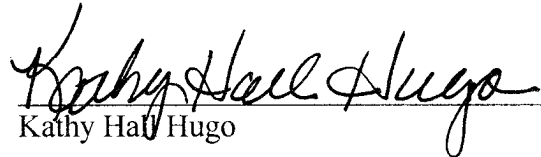
1. I am Jon Hall's oldest sibling. I am 14 years older than Jon. I was out of the house by the time Jon was 5 years old. However, even though I got married in 1969, we lived next door in a trailer until 1974.
2. I don't remember being a kid and having fun. I always had to watch the younger children. When they were building the new house, as soon as Dad got home they would go work on the house and I would be babysitting them all. Sheryl was a baby then. They worked on the house for a long time. We moved into this house shortly after Joel was born.
3. While Mom and Dad argued at the old house, it got worse at the new house.
4. I remember a time when a big rock was thrown through the car windshield. It seems they each did it, Dad threw one through her window and Mom threw one through his windshield. Dad was not happy that Mom had a car.
5. Dad went to work early. He was gone before we got up for school. He didn't get home until 6 p.m., if he came home at all. He had a union meeting probably once a month and it would be real late when he came home.
6. When Dad didn't come home on time, Mom would put us all in the car and go looking for him at the bar. Dad drank a lot.
7. We couldn't find Dad when the house caught on fire. Joel was playing with matches, he was little and Jon was just a baby.
8. Mom and Dad fought a lot. At times those fights involved physical abuse. During one fight when Dad was beating Mom, Jon tried to protect Mom by hitting Dad with a flyswatter. At times Mom would threaten Dad with a knife; Dad would threaten Mom with a gun.
9. The arguments between my parents were over Mom asking Dad, "where were you, why weren't you home on time?" She'd get mad, he'd get mad. It was mostly that kind of stuff or he'd make comments about her family. I think my dad didn't like anyone that sided against him.
10. Another reason my parents fought was because Mom's parents both died before Dad died.

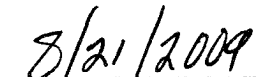
They left Mom some stock and Dad thought she should sell the stock and use it for the family and she wouldn't do it. Dad's idea of a good wife was for her to be barefoot and pregnant.

11. Mom would hit us on the head or hand with metal knitting needles.
12. Mom kept a clean house, she yelled at us all the time to clean up our mess. Mom was bossy, she still is.
13. Joel and Jon used to get in trouble a lot. Dad would yell at them and sometimes hit them with a belt. It was always a bad day when we got our report cards. Even though we girls had good report cards we didn't get any praise at all. It was all negative toward the boys.
14. I don't think my dad had any idea how to be a father, because his father didn't know either. Dad played favorites. He treated Jon bad while he treated Joel better. When he took Joel places, Jon would just watch. Dad did this because he believed Jon wasn't his son. Dad told Jon that.
15. The best times we kids had was when we spent time with our maternal grandparents. There was no fighting there ever. However, only the girls went to these grandparents.
16. Dad died in 1974. I was already married but lived on the same property in a trailer. Dad left each of us children \$3000. I used this for a down payment on a house and moved to another part of town.
17. After Dad died Mom wasn't there for Sheryl, Joel and Jon who were still living at home.
18. Mom married Ed Alexander three months after Dad died. He acted like he had all this money. He was always buying Mom presents before they got married. After they were married we found out the truth that he was after the money he thought Mom had. One time Ed beat Mom when she confronted him about sexually abusing Sheryl.
19. Ed didn't seem to care for Joel and Jon. He would buy them stuff but not do anything with them. He would give them stuff to keep them out of the way. Ed had a nasty temper too, he'd get mad and his eyes would bug out. They separated and were in the process of getting a divorce when he died of a stroke.
20. After Ed Alexander died, Mom was involved with another guy in Blairsville. She left Joel and Jon staying alone at the family home. They were getting into trouble not going to school. They would do things like take my husband's car from where he parked it when he went to work and drive it around. They would go to my house and shoot pool all day. However, they would be gone when I got home. We could tell that the car had been used and I could tell when they had been at the house.

21. Jon did not play favorites with Billie's children. He treated the children from Billie's prior marriage just as well as the children born to him and Billie.
22. Jon's attorneys did not speak to me until the night before his trial. I went to Jon's trial and would have testified to the above if asked.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Kathy Hall Hugo

  
Date